

# Exhibit A



## Notice of Service of Process

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Date Processed: 01/06/2022

**Primary Contact:** SOP UPS - United Parcel  
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251 Little Falls Dr  
Wilmington, DE 19808-1674

**Electronic copy provided to:** Sonja Jackson  
Arlette Willis

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**Entity:** United Parcel Service, Inc.  
Entity ID Number 2551129

**Entity Served:** United Parcel Service, Inc.

**Title of Action:** Rhonda Bingham vs. United Parcel Service, Inc.

**Matter Name/ID:** Rhonda Bingham vs. United Parcel Service, Inc. (11890416)

**Document(s) Type:** Notice and Complaint

**Nature of Action:** Personal Injury

**Court/Agency:** Philadelphia County Court of Common Pleas, PA

**Case/Reference No:** 001792 December 2021

**Jurisdiction Served:** Georgia

**Date Served on CSC:** 01/06/2022

**Answer or Appearance Due:** 20 Days

**Originally Served On:** UPS Location

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**Sender Information:** Jeffrey R. Lessin & Associates, P.C.  
215-599-1400

**Client Requested Information:** Matter Type: Other/NA

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## United Parcel Service (A270361) – Client Direct Cover Sheet

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**Name: Sonja D. Jackson**

**Phone Number: 404-828-7579**

**Email Address: sdjackson@ups.com; sop@ups.com**

**Ship the package to:**

**United Parcel Service Client Directs (UPS A270361)  
C/O LMS Department  
CSC  
251 Little Falls Drive  
Wilmington DE 19808**

Court of Common Pleas of Philadelphia County  
Trial Division**Civil Cover Sheet**

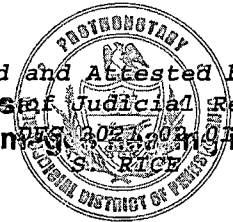
<b>PLAINTIFF'S NAME</b> RHONDA BINGHAM		For Prothonotary Use Only (Docket Number) <b>DECEMBER 2021</b>	
		<b>001792</b> E-Filing Number: 2112049041	
<b>PLAINTIFF'S ADDRESS</b> 6904 DICKS AVENUE PHILADELPHIA PA 19142		<b>DEFENDANT'S ADDRESS</b> 1 HOG ISLAND ROAD PHILADELPHIA PA 19153	
<b>PLAINTIFF'S NAME</b>		<b>DEFENDANT'S NAME</b>	
<b>PLAINTIFF'S ADDRESS</b>		<b>DEFENDANT'S ADDRESS</b>	
<b>PLAINTIFF'S NAME</b>		<b>DEFENDANT'S NAME</b>	
<b>PLAINTIFF'S ADDRESS</b>		<b>DEFENDANT'S ADDRESS</b>	
<b>TOTAL NUMBER OF PLAINTIFFS</b> 1	<b>TOTAL NUMBER OF DEFENDANTS</b> 1	<b>COMMENCEMENT OF ACTION</b> <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
<b>AMOUNT IN CONTROVERSY</b> <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	<b>COURT PROGRAMS</b> <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:		
<b>CASE TYPE AND CODE</b> 2S - PREMISES LIABILITY, SLIP/FALL			
<b>STATUTORY BASIS FOR CAUSE OF ACTION</b>			
<b>RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)</b>		<b>FILED PRO PROTHY</b> <b>DEC 27 2021</b> <b>S. RICE</b>	
<b>NAME OF PLAINTIFFS/PETITIONER'S/APPELLANT'S ATTORNEY</b> JEFFREY R. LESSIN		<b>IS CASE SUBJECT TO COORDINATION ORDER?</b> YES    NO	
<b>PHONE NUMBER</b> (215) 599-1400	<b>FAX NUMBER</b> (215) 599-0120	<b>ADDRESS</b> 1515 MARKET ST SUITE 1650 PHILADELPHIA PA 19102	
<b>SUPREME COURT IDENTIFICATION NO.</b> 43801		<b>E-MAIL ADDRESS</b> j.lessin@lessinlaw.com	
<b>SIGNATURE OF FILING ATTORNEY OR PARTY</b> JEFFREY LESSIN		<b>DATE SUBMITTED</b> Monday, December 27, 2021, 02:01 pm	

JEFFREY R. LESSIN & ASSOCIATES, P.C.  
BY: JEFFREY R. LESSIN, ESQUIRE  
J.Lessin@lessinlaw.com  
I.D. #: 43801  
BY: MARK T. RICHTER, ESQUIRE  
I.D. #: 45195

1515 Market Street, Suite 1650  
PHILADELPHIA, PA 19102

(215) 599-1400

Filed and Attested by the  
This is a Major Case of Judicial Records  
Assessment of damages. 02/04/22  
required.



JURY TRIAL DEMANDED

ATTORNEYS FOR PLAINTIFF

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RHONDA BINGHAM	:	COURT OF COMMON PLEAS
6904 Dicks Avenue	:	OF PHILADELPHIA COUNTY
Philadelphia, PA 19142	:	
vs.	:	
	:	
UNITED PARCEL SERVICE, INC.	:	No.
1 Hog Island Road	:	
Philadelphia, PA 19153	:	

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CIVIL ACTION COMPLAINT  
2S -PREMISES LIABILITY- SLIP AND FALL  
WITH NOTICE TO DEFEND

**NOTICE**

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Association

Lawyer Referral and Information  
Service

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Philadelphia, Pennsylvania 19107  
(215) 238-170

**AVISO**

LE HAN DEMANDADO A USTED EN LA CORTE. SI USTED QUIERE DEFENDERSE DE ESTAS DEMANDAS EXPUESTAS EN LAS PAGINAS SIGUIENTES, USTED TIENE VIENTE (20) DIAS, DE PLAZO AL PARTIR DE LA FECHA DE LA DEMANDA Y LA NOTIFICATION. HACE FALTA ASENTAR UNA COMPARENCIA ESCRITA O EN FORMA ESCRITA SUS DEFENSAS O SUS OBJECIONES A LAS DEMANDAS EN CONTRA DE SU PERSONA. SEA AVISADO QUE SI USTED NO SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDE CONTINUAR LA DEMANDA EN CONTRA SUYA SIN PREVIO AVISO O NOTIFICACION. ADEMÁS, LA CORTE PUEDE DICIIR A FAVOR DEL DEMANDANTE Y REQUIERE QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. USTED PUEDE PERDER DINERO O SUS PROPIEDADES U OTROS DERECHOS IMPORTANTES PARA USTED.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

Asociacion de Liceneados de  
Filadelfia

Servicio de Referencia e Informacion  
Legal

One Reading Center

**JEFFREY R. LESSIN & ASSOCIATES, P.C.**

**BY: JEFFREY R. LESSIN, ESQUIRE**

**J.Lessin@lessinlaw.com**

**I.D. #: 43801**

**1515 Market Street, Suite 1650**

**PHILADELPHIA, PA 19102**

**(215) 599-1400**

**This is a Major Case.**

**Assessment of damages hearing is  
required.**

**JURY TRIAL DEMANDED**

**ATTORNEYS FOR PLAINTIFF**

---

<b>RHONDA BINGHAM</b>	<b>:</b>	<b>COURT OF COMMON PLEAS</b>
<b>6904 Dicks Avenue</b>	<b>:</b>	<b>OF PHILADELPHIA COUNTY</b>
<b>Philadelphia, PA 19142</b>	<b>:</b>	
<b>vs.</b>	<b>:</b>	
	<b>:</b>	
<b>UNITED PARCEL SERVICE, INC.</b>	<b>:</b>	<b>No.</b>
<b>1 Hog Island Road</b>	<b>:</b>	
<b>Philadelphia, PA 19153</b>	<b>:</b>	

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**CIVIL ACTION COMPLAINT**  
**2S-PREMISES LIABILITY- SLIP AND FALL**

1. Plaintiff **RHONDA BINGHAM** is an adult individual, who resides at the  
above-captioned address.

2. Defendant **UNITED PARCEL SERVICE, INC.** (hereinafter referenced as “Defendant **UPS**”) is a corporation, partnership, and/or limited liability company, and/or other business entity, organized and doing business in the Commonwealth of Pennsylvania, with offices at the above-captioned address, which regularly conducts business in Philadelphia, Pennsylvania, and which at all relevant times did own, operate, maintain, and/or manage a place of business and the real property located at 1 Hog Island Road, Philadelphia, PA 19153, (hereinafter referenced as the “Premises”) where the incident described herein occurred.

3. Venue is proper in Philadelphia County pursuant to Pennsylvania Rules of Civil Procedure 1006 and 2179, because the subject incident occurred in Philadelphia, and the Defendant regularly conducts business in Philadelphia.

4. At all times relevant hereto, Defendant **UPS** owned, occupied, operated, managed, controlled and/or maintained the real property identified herein as the Premises.

5. At all times relevant hereto, Defendant **UPS** occupied the Premises, and provided for maintenance, management, inspection, control, engineering and safety on the above referenced Premises.

6. At all times material hereto, the above identified Defendant acted through its agents, servants, workmen and/or employees, all of whom were acting within the course and scope of their employment, agency, and authority.

7. At all times material hereto, Plaintiff **RHONDA BINGHAM** was a business invitee who was leaving the Premises after her shift as a security guard employed by



non-party Allied Universal, which is an independent contractor providing security services at the above referenced Premises.

8. At all times material hereto, Plaintiff **RHONDA BINGHAM** was a business invitee on the above referenced Premises, to whom the Defendant owed the highest duty of care.

9. On January 15, 2021, shortly after midnight, Plaintiff **RHONDA BINGHAM** was leaving the Premises, having concluded her shift working for Allied Universal as a security guard, and was attempting to exit the above referenced Premises by walking on the sidewalk in the Defendant's lot near the west gate of the Premises, when she was caused to trip, stumble and fall on an unexpected, unlit, and/or camouflaged change in elevation on the designated walkway, resulting in serious injury (more fully hereinafter described).

10. On the aforesaid date, the Defendant, by and through its agents, servants, workmen and/or employees, owned, managed, possessed, controlled, maintained and supervised the Premises where the incident hereinafter described occurred, and the Defendant knew, and/or should have known, of the existence of the hazardous condition of the Premises described herein.

11. On January 15, 2021, and for a period of time prior thereto, there existed on the aforesaid walking surface of the Premises, obstructions, defects and irregularities in the form of an unexpected, unlit, and/or camouflaged change in elevation on the designated walkway.

12. At all times relevant hereto, Defendant **UPS**, knew, and/or had reason to know, that business invitee pedestrians would be walking on designated sidewalks/walkways of the walking surface of the said Premises.

**COUNT I**

**RHONDA BINGHAM vs. UPS**

13. The averments of paragraphs one (1) through twelve (12), inclusive, are incorporated by reference as fully as though they were set forth here at length.

14. Defendant **UPS**, by and through its agents, servants, workmen and/or employees, acting in the course of their employment and within the scope of their authority, knew or should have known of the existence of the aforementioned defective and dangerous conditions prior to the Plaintiff's fall and the Defendant was obliged to correct, remedy, repair, warn of, and/or eliminate said defective and dangerous conditions.

15. The carelessness and negligence of the Defendant **UPS**, through its agents, employees, servants and workmen, consisted of the following acts or omissions:

- a. Failing to properly and adequately inspect the defective walking surface at the aforesaid location;
- b. Failing to warn business invitee pedestrians of the said defective condition(s) of which Defendant was aware and/or should have been aware, especially the depression/elevation change in the sidewalk which caused Plaintiff **RHONDA BINGHAM** to fall;

- c. Failing to select and hire competent employees and/or contractors to maintain and/or repair the said defective walking surface at the aforesaid location;
- d. Failing to maintain, correct and/or repair the said walking surface at the aforesaid location, in a manner which would protect and safeguard business invitee pedestrians lawfully upon the Premises and reasonably prevent them from unreasonable risks of falling;
- e. Creating and/or allowing the aforesaid defective condition to continue to exist, so as to constitute a menace, danger, nuisance, trap and/or hazard to business invitees and other persons lawfully walking there;
- f. Providing a walking surface which had an unreasonable, camouflaged and/or poorly illuminated change in elevation which defect presented a danger to pedestrians;
- g. Failing to provide any visual cue or warning that the subject walking surface had a camouflaged and/or poorly illuminated elevation change;
- h. Allowing a dangerous condition to exist which was in violation of the codes and ordinances of Philadelphia pertaining to said walking surface at the aforesaid location, particularly the Building Code, Construction Code and the BOCA National Codes, specifically as adopted and revised by Philadelphia, as they apply to changes in elevation on walking surfaces; and.

j. Failing to maintain the defective walking surface at the aforesaid location in a reasonable manner.

16. By reason of the aforesaid negligence of the Defendant as hereinabove described, Plaintiff **RHONDA BINGHAM** suffered severe and permanent injuries including but not limited to: right knee medial meniscus tear, right knee lateral meniscus tear; right knee sprain; right knee contusion; right knee pain; sprain of lumbar ligaments; low back pain and injury; exacerbation and aggravation of bilateral knee osteoarthritis which may require total knee replacement; nervous shock and aggravation and/or exacerbation of all known and unknown preexisting medical conditions. Plaintiff **RHONDA BINGHAM** suffered internal injuries of an unknown nature; she suffered severe aches pains, mental anxiety and anguish, and a severe shock to her entire nervous system, and other injuries the full extent of which are not yet known. She was caused to undergo medical treatment due to these injuries, aggravations and/or exacerbations. She has in the past and will in the future undergo severe pain and suffering and will in the future be unable to attend to her usual duties and occupations, all to her great financial detriment and loss. Plaintiff **RHONDA BINGHAM** believes and therefore avers that her injuries are permanent in nature.

17. As a direct result of the aforesaid occurrence, Plaintiff **RHONDA BINGHAM** has been compelled, in order to effectuate a cure for the aforesaid injuries, to expend large sums of money for medicine and medical attention and may be required to expend additional sums for the same purposes in the future.

18. As a direct result of the aforesaid occurrence, Plaintiff **RHONDA BINGHAM** has been prevented from attending to her usual and daily activities and

duties, and may be so prevented for an indefinite time in the future, all to her great financial detriment and loss.

19. As a result of the aforesaid occurrence Plaintiff has suffered physical pain and mental anguish and humiliation and she may continue to suffer same for an indefinite period of time in the future.

**WHEREFORE**, Plaintiff **RHONDA BINGHAM** demands damages of the Defendant **UNITED PARCEL SERVICE, INC.** in a sum in excess of **FIFTY THOUSAND (\$50,000.00) DOLLARS**, plus costs.

**JEFFREY R. LESSIN & ASSOCIATES, P.C.**

BY: Jeffrey R. Lessin  
JEFFREY R. LESSIN, ESQUIRE  
MARK T. RICHTER, ESQUIRE  
Attorneys for Plaintiff RHONDA BINGHAM

**VERIFICATION**

RHONDA BINGHAM, state that I am the Plaintiff in this matter and that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief; and that this statement is made subject to the penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.

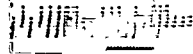
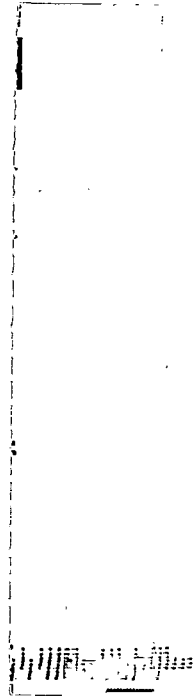
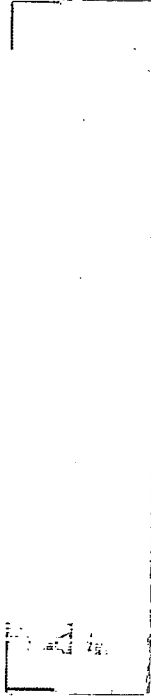
*Rhonda Bingham*

ID: A7Y6JN4PQzVhGMjedLzNWF

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RHONDA BINGHAM

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE



*Bonnie Rakoczy, Paralegal  
Jeffrey R. Lessin & Associates, P.C.  
1515 Market Street, Suite-1650  
Philadelphia, PA 19102*



7012 3460 0002 5982 0162

RETURN RECEIPT REQUESTED

**\$8.95 0**  
**US POSTAGE**  
**FIRST-CLASS**  
062S0011287094  
19102



5298

*United Parcel Services, Inc.  
55 Glen Lake Parkway NE  
Atlanta, Georgia 30328*

34  
Legal

151



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